

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

JUL - 3 2012

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

NADINE JONES and
MARCUS GRANT,
Plaintiffs,

V.

CHARLES WALTERS,
JERRY SCAIFE, JAMES CARTER,
SHARMAUN FREEMAN, KEVIN SELLERS,
GUSTAVO CORONA, MARKEE COOPER,
RODERICK WATSON, and
CHICAGO POLICE DEPARTMENT,
Defendants

12cv5283

Judge Joan B. Gottschall
Mag. Judge Maria Valdez

COMPLAINT AT LAW

Now come the Plaintiffs, Nadine Jones and Marcus Grant, by their attorney, Keith L. Young and complaining of the Defendants, Charles Walters, Jerry Scaife, James Carter, Sharmaun Freeman, Kevin Sellers, Gustavo Corona, Markee Cooper, Roderick Watson, and the Chicago Police Department states as follows:

COUNT 1 – VIOLATION OF CIVIL RIGHTS

1. That on and prior to March 31, 2011, the Defendants, Charles Walters, Jerry Scaife, James Carter, Sharmaun, Freeman, Kevin Sellers, Gustavo Corona, Markee Cooper, Roderick Watson Charles Walters were police officers employed by the Defendant, Chicago Police Department.

2. That at all times relevant hereto, the Defendants, Charles Walters, Jerry Scaife, James Carter, Sharmaun Freeman, Kevin Sellers, Gustavo Corona, Markee Cooper, Roderick Watson were acting under color of law and within the scope of their duties as police officers and were acting both individually and as agent, servants, and employees of the Chicago Police Department.

3. That on or about March 31, 2011, the Plaintiffs, Nadine Jones and Marcus Grant were present in their apartment located at 6001 South Morgan Street in the City of Chicago.

4. That the Defendants and other unnamed Chicago police officers, broke down the door and entered the Plaintiffs' apartment without knocking or displaying a search or arrest warrant.

5. That the Defendants intentionally touched the Plaintiff, Nadine Jones about her body and limbs, handcuffed her, pulled down clothing and underwear without her consent or permission.

6. That the Defendants intentionally touched the Plaintiff, Marcus Grant about his body and limbs, and handcuffed him without his consent or permission.

7. That the Defendants lacked probable cause to believe that the Plaintiffs had committed a crime and lacked probable cause to search their apartment.

8. That the Plaintiffs were not arrested and no criminal charges were brought against them.

9. Plaintiffs had a right under 42 U.S.C 1983 and the Constitution of the United States of America and the Constitution of the State of Illinois to be free from unreasonable searches and seizures and a reasonable expectation of privacy.

10. That the acts of the Defendants violated the Plaintiff's rights under 42 U.S.C. 1983 and the Constitution of the United States of America and the Constitution of the State of Illinois.

Wherefore, the Plaintiffs, Nadine Jones and Marcus Grant demand compensatory damages from the Defendants, Chicago Police Department, Charles Walters, Jerry Scaife, James Carter, Sharmaun, Freeman, Kevin Sellers, Gustavo Corona, Markee Cooper, Roderick Watson in an the amount in excess of the minimum rules of \$75,000.00 plus punitive damages, plus costs and attorneys fees.

COUNT 2 - FALSE IMPRISONMENT

1. Plaintiffs reallege paragraph 1 of Count 1.
2. Plaintiffs reallege paragraph 2 of Count 1.
3. Plaintiffs reallege paragraph 3 of Count 1.
4. Plaintiffs reallege paragraph 4 of Count 1.
5. Plaintiffs reallege paragraph 5 of Count 1.
6. Plaintiffs reallege paragraph 6 of Count 1.
7. Plaintiffs reallege paragraph 7 of Count 1.
8. Plaintiffs reallege paragraph 8 of Count 1.
9. That at all times mentioned, the Defendants intended to restrain the Plaintiffs.
10. That the acts of the Defendants constitute false imprisonment.

Wherefore, the Plaintiffs, Nadine Jones and Marcus Grant demand compensatory damages from the Defendants, Chicago Police Department, Charles Walters, Jerry Scaife, James Carter, Sharmaun, Freeman, Kevin Sellers, Gustavo Corona, Markee Cooper, Roderick Watson in an the amount in excess of the minimum rules of the Circuit Court of Cook County plus punitive damages, plus costs and attorneys fees.

COUNT 3 - INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

1. Plaintiffs reallege paragraph 1 of Count 1.
2. Plaintiffs reallege paragraph 2 of Count 1.
3. Plaintiffs reallege paragraph 3 of Count 1.
4. Plaintiffs reallege paragraph 4 of Count 1.

5. Plaintiffs reallege paragraph 5 of Count 1.
6. Plaintiffs reallege paragraph 6 of Count 1.
7. Plaintiffs reallege paragraph 7 of Count 1.
8. Plaintiffs reallege paragraph 8 of Count 1.
9. That the acts of the Defendants caused the Plaintiffs to suffer severe emotional distress.

Wherefore, the Plaintiffs, Nadine Jones and Marcus Grant demand compensatory damages from the Defendants, Chicago Police Department, Charles Walters, Jerry Scaife, James Carter, Sharmaun, Freeman, Kevin Sellers, Gustavo Corona, Markee Cooper, Roderick Watson in an the amount in excess of the minimum rules of the Circuit Court of Cook County plus punitive damages, plus costs and attorneys fees.

COUNT 4 - BATTERY

1. Plaintiffs reallege paragraph 1 of Count 1.
2. Plaintiffs reallege paragraph 2 of Count 1.
3. Plaintiffs reallege paragraph 3 of Count 1.
4. Plaintiffs reallege paragraph 4 of Count 1.
5. Plaintiffs reallege paragraph 5 of Count 1.
6. Plaintiffs reallege paragraph 6 of Count 1.
7. Plaintiffs reallege paragraph 7 of Count 1.
8. Plaintiffs reallege paragraph 8 of Count 1.
9. That the acts of the Defendants constitute battery.

Wherefore, the Plaintiffs, Nadine Jones and Marcus Grant demand compensatory damages from the Defendants, Chicago Police Department, Charles Walters, Jerry Scaife, James Carter,

Sharmaun, Freeman, Kevin Sellers, Gustavo Corona, Markee Cooper, Roderick Watson in an the amount in excess of the minimum rules of the Circuit Court of Cook County plus punitive damages, plus costs and attorneys fees.

A handwritten signature in black ink, appearing to read "Keith L. Young". The signature is written in a cursive, flowing style with some loops and flourishes.

Keith L. Young

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